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Attorneys for Defendant
WARREN PUMPS, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JAMES FARRIS,

Plaintiff,

v.

WARREN PUMPS, LLC,

Defendant.

No. 3:08-CV-00231-EDL

**DEFENDANT WARREN PUMPS, LLC'S
NOTICE OF TAG-ALONG ACTION**

PLEASE TAKE NOTICE THAT on July 29, 1991, the Judicial Panel on Multidistrict Litigation entered an order transferring all asbestos cases pending in federal court to the United States District Court, Eastern District of Pennsylvania, for coordinated or consolidated pretrial proceedings pursuant to U.S.C. § 1407 ("MDL Transfer Order"). That order also applies to "tag-along actions," or actions involving common questions of fact filed after the January 1991 filings of the Panel's Order to Show Cause. MDL Rule 13(e) provides:

Any party or counsel in actions previously transferred under section 1407 or under consideration by the Panel for transfer under section 1407 shall promptly notify the Clerk of the Panel of any potential "tag-along actions" in which that party is also named or in which that counsel appears.

1 The undersigned hereby notifies the court that this is a potential "tag-along
2 action" which may be subject to transfer to the Eastern District of Pennsylvania. The
3 Clerk of the Panel may either: 1) enter a conditional transfer order pursuant to MDL Rule
4 12(a), or 2) file an order to show cause why the action should not be transferred, pursuant
5 to MDL Rule 13(b).

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7 Dated: April 3, 2008

8 CARROLL, BURDICK & McDONOUGH LLP

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10 By  _____

11 John G. Lee

12 Attorneys for Defendant
13 WARREN PUMPS, LLC
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1 *James Farris v. Warren Pumps, LLC*
2 United States District Court, Northern District of California
3 Action No. CV-08-0231-EDL

4 **PROOF OF SERVICE BY ELECTRONIC TRANSMISSION**

5 I, the undersigned, declare: that I am, and was at the time of service of the
6 documents herein referred to, over the age of 18 years, and am not a party to the action;
and I am employed in the County of San Francisco, California. My business address is 44
Montgomery Street, Suite 400, San Francisco, California 94104.

7 On the date executed below, I electronically served the document(s) described
8 as:

9 **DEFENDANT WARREN PUMPS, LLC'S NOTICE OF TAG-ALONG ACTION**

10 on recipients designated on the United States District Court, Northern District of
California's website.

11 I declare under penalty of perjury pursuant to the laws of the State of
12 California, that the foregoing is true and correct, and was executed on April 3, 2008 at San
Francisco, California.

13
14 
15 Margaret Foley